

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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In re:

William M. Webster,  
Laura L. Webster,

Case No. 3-23-11173-cjf

Debtors.

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**OBJECTION TO CREDITOR'S MOTION TO FOR RELIEF FROM STAY**

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Debtors, William M. Webster and Laura L. Webster, by their attorneys at Krekeler Law, S.C., hereby object to Citizens Bank, N.A.'s (f/k/a RBS Citizens N.A.) ("Creditor") Motion for Relief from Automatic Stay or in the Alternative to Dismiss for Failure to Make Post-Petition Plan Payments. The grounds for this objection are:

1. Debtors' income is partially derived from commissions and is therefore subject to fluctuations through the year. Commissions are realized on a delayed basis.
2. In the months preceding the filing of this motion, Debtors' income was less than expected based on the commissions earned.
3. Notwithstanding this change, Debtors have continued to make their Chapter 13 plan payments on time.
4. Debtors expect income to return to the estimated amount reflected in Debtors' Schedules filed with the Court on July 24, 2023, over the next 6 months (Docket No. 11).
5. Debtors have contacted Creditor to arrange for the payment of the post-petition arrearage accrued as set forth in Creditor's Motion and to stipulate to the withdrawal of Creditor's Motion.
6. Debtors will resume and continue their plan payments and direct mortgage payments as prescribed by the Debtors' Confirmed Chapter 13 Plan.

The Debtors request a hearing on the Motion.

Dated this 5<sup>th</sup> day of January 2024.

**KREKELER LAW, S.C.**

By: /s/ Noe J. Rincon

Noe J. Rincon

State Bar No. 1124893

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